

## **REMARKS**

Applicant respectfully requests reconsideration and allowance of the subject application. Claims 1, 16, 19, 22, and 25 are amended. Claims 1-27 are pending in this application.

### **Objections to the Specification**

In the August 16 Office Action, the disclosure was objected to because it contains an embedded hyperlink and/or other form of browser-executable code (e.g., page 22, lines 16-25). As part of this Response, the specification has been amended on pages 22, 23, and 24 to correct these issues.

Also in the August 16 Office Action, the disclosure was objected to because on page 3, line 16 “ushered” appears to be “unshared”. The sentence including the word “ushered” reads: “To accommodate the shift to the distributed computing environment being ushered in by the Internet, Microsoft Corporation is developing a network software platform known as the “.NET” platform (read as “Dot Net”).” (see, page 3, lines 15-20). Upon review of this section of the disclosure, Applicant respectfully submits that “ushered” is correct and that it should not be changed to “unshared”.

Applicant respectfully requests that objections to the disclosure be withdrawn.

**35 U.S.C. § 102**

Claims 4-12 stand rejected under 35 U.S.C. §102(e) as being unpatentable over .NET Framework Essentials by Lam (hereinafter “Lam”). Applicant respectfully submits that claims 4-12 are not anticipated by Lam.

The subject matter of claims 4-12 was conceived prior to the June 2001 publication date of Lam, and filing of the above identified application was diligently pursued from prior to June 2001 until the filing of the above identified application on July 10, 2001. A Declaration under 37 C.F.R. §1.131 is being prepared with supporting documentation to evidence that the invention was conceived in the United States prior to the June 2001 publication date of Lam, coupled with due diligence from prior to the June 2001 publication date of Lam to filing of the application. Accordingly, the Lam reference should be removed as a reference because it is not prior art.

Accordingly, Applicant respectfully requests that the rejection of claims 4-12 over Lam be withdrawn.

Claim 12 stands rejected under 35 U.S.C. §102(e) as being unpatentable over US Publication No. 2002/0169679 by Neumayer (hereinafter “Neumayer”). Applicant respectfully submits that claim 12 is not anticipated by Neumayer.

Neumayer is directed to an aggregation engine for an electronic commerce system (see, Title). As discussed in the abstract of Neumayer, Neumayer describes an aggregation engine for use in electronic commerce systems, such as an enterprise procurement system or an electronic marketplace, that automatically aggregates buyer demands according to an aggregation rule so as to enable the creation of fewer purchase orders and to take advantage of bulk buying power.

Claim 12 recites:

An XmlValidatingReader class of an application program interface, embodied on one or more computer readable media, that enables DTD, XDR and XSD schema validation, the XmlValidatingReader class comprising:

a ValidationType property that enables obtaining an indication of what type of validation to perform on a document;

a Read method that enables reading of nodes of the document so that validation of the document can be performed.

Applicant respectfully submits that Neumayer does not disclose the XmlValidatingReader class of an application program interface of claim 12.

In the August 16 Office Action, Neumayer is cited at pages 2-3, paragraphs 33-34, as disclosing the XmlValidatingReader class of an application program interface of claim 12. Neumayer discusses that, when the aggregation engine is called, the incoming data is validated (see, page 2, paragraphs 32-33). This validation can be accomplished through a class called XMLValidator, which is a helper class to check if the XML data is valid (see, pages 2-3, paragraph 33). A method of validateXML can be used to check the given XML against the schema (see, page 3, paragraph 33).

However, nowhere does Neumayer disclose a ValidationType property that enables obtaining an indication of what type of validation to perform on a document as recited in claim 12. There is no mention or discussion in Neumayer of obtaining an indication of a particular type of validation to perform on a document, much less of a ValidationType property that enables obtaining an indication of that particular type. Absent any mention or discussion of such a ValidationType property, Applicant respectfully submits that Neumayer cannot

disclose the XmlValidatingReader class of an application program interface of claim 12.

Furthermore, nowhere does Neumayer disclose a Read method that enables reading of nodes of the document so that validation of the document can be performed as recited in claim 12. Neumayer discloses that the incoming XML document is processed to extract the demands to be aggregated and the aggregation rule, which could be accomplished through an XMLProcessor class, which extracts information from the XML and creates the rule object, the aggregateeformat object and the aggregatee object (see, page 3, paragraph 34). However, this processing discussed in paragraph 34 is performed in step 170 (see, page 3, paragraph 34, and Figure 2), whereas the validation is performed in step 160 (see, page 2, paragraph 33, and Figure 2). There is no disclosure in Neumayer that the extraction of information in step 170 is performed so that the validation of step 160 can be performed. Absent such disclosure, Applicant respectfully submits that Neumayer cannot disclose the Read method that enables reading of nodes of the document so that validation of the document can be performed of claim 12.

For at least these reasons, Applicant respectfully submits that claim 12 is allowable over Neumayer.

Applicant respectfully requests that the §102 rejections be withdrawn.

### **35 U.S.C. § 103**

Claims 1, 16, 19, 22, and 25 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent No. 6,418,448 to Sarkar (hereinafter

“Sarkar”) in view of U.S. Patent No. 6,209,124 to Vermeire et al. (hereinafter “Vermeire”). Applicant respectfully submits that claims 1, 16, 19, 22, and 25 are not obvious over Sarkar in view of Vermeire.

As discussed in the abstract of Sarkar, Sarkar is directed to a system for navigation through multiple documents in Extensible Markup Language (XML) and Resource Description Framework (RDF) to inspect data/metadata in order to either start a transaction on selected item(s) in separate thin client window(s) with persistent connectivity through Internet Inter ORB Protocol or implicitly trigger read-only queries in Structured Query Language (SQL) represented in RDF against a unified virtual Database defined over multiple physical disparate object relational databases over the web. An implicitly generated query retrieves desired sets of properties and entities presented in documents of XML and RDF for further navigation. Container types in RDF are mapped by Sarkar to record and table types in a normalized relational model where URIs locating elements in relational schema components over the web are stored as primary keys/foreign keys in normalized tables. Methods and operators on such web objects are defined as part of user-defined package definitions in object relational schema where object request brokers apply such methods or operators on result sets from relational operations anywhere on the web.

Vermeire is directed to a method of markup language accessing of host systems and data using a constructed intermediary (see, Title). In Vermeire, information about host computer software application structures, called metadata, is blended with either the XML representation or the binary data values to generate binary data for use with a host system or an XML representation for use

in mark-up language applications (see, col. 5, lines 2-6). A constructed intermediary is utilized which is user defined based upon the application language utilized by the host computer (see, col. 5, lines 6-9). The intermediary functions to restructure in-memory binary data streams received from the host into XML documents and to restructure XML documents into binary data streams capable of acting with the host machine and its program applications (see, col. 5, lines 12-16).

In contrast, amended claim 1 recites, in part:

an application program interface to present functions used by the application to access network and computing resources of the distributed computing system, wherein the application program interface comprises a set of classes that make available standards-based support for processing XML documents, wherein the set of classes are grouped in the application program interface into a plurality of namespaces, and wherein a first of the plurality of namespaces contains classes and enumerations to support XSLT (Extensible Stylesheet Language Transformations) and a second of the plurality of namespaces contains an XPath parser and evaluation engine.

Applicant respectfully submits that no such application program interface is disclosed or suggested in Sarkar in view of Vermeire.

With respect to Sarkar, Sarkar is not cited as disclosing or suggesting, and does not disclose or suggest, an application program interface that comprises a set of classes that make available standards-based support for processing XML documents, much less the set of classes being grouped into a plurality of namespaces as recited in amended claim 1.

With respect to Vermeire, Applicant notes that Vermeire discusses an operator interface for the MPADS (Machine and Programming Architecture and Host Data Structure) component that invokes a parser to convert source code into

a tree form, provide editing for the tree and generating the metadata XML using the XML Writer class (see, col. 20, lines 8-10, and col. 5, lines 55-57). However, nowhere in Vermeire is there any discussion or mention of grouping classes of an application program interface into a plurality of namespaces, much less of a first of the plurality of namespaces that contains classes and enumerations to support XSLT (Extensible Stylesheet Language Transformations) and a second of the plurality of namespaces that contains an XPath parser and evaluation engine as recited in amended claim 1. Absent any such discussion or mention, Applicant respectfully submits that Vermeire cannot disclose or suggest the application program interface of amended claim 1.

As neither Sarkar nor Vermeire discloses or suggests the application program interface of amended claim 1, Applicant respectfully submits that the combination of Sarkar and Vermeire does not disclose or suggest the application program interface of amended claim 1.

For at least these reasons, Applicant respectfully submits that amended claim 1 is allowable over Sarkar in view of Vermeire.

With respect to amended claim 16, amended claim 16 recites in part:

an application programming interface to interface the one or more applications with the networking platform, wherein the application program interface comprises a set of classes that make available standards-based support for processing documents written in a markup language, wherein the set of classes are grouped in the application programming interface into a plurality of namespaces, and wherein a first of the plurality of namespaces contains classes and enumerations to support XSLT (Extensible Stylesheet Language Transformations), a second of the plurality of namespaces contains an XPath parser and evaluation engine, and a third of the plurality of namespaces contains classes used to serialize objects into XML format documents or streams.

Applicant respectfully submits that no such application programming interface is disclosed or suggested in Sarkar in view of Vermeire.

With respect to Sarkar, Sarkar is not cited as disclosing or suggesting, and does not disclose or suggest, an application programming interface that comprises a set of classes that make available standards-based support for processing documents written in a markup language, much less the set of classes being grouped into a plurality of namespaces as recited in amended claim 16.

With respect to Vermeire, Applicant notes that Vermeire discusses an operator interface for the MPADS (Machine and Programming Architecture and Host Data Structure) component that invokes a parser to convert source code into a tree form, provide editing for the tree and generating the metadata XML using the XML Writer class (see, col. 20, lines 8-10, and col. 5, lines 55-57). However, nowhere in Vermeire is there any discussion or mention of grouping classes of an application programming interface into a plurality of namespaces, much less of a first of the plurality of namespaces that contains classes and enumerations to support XSLT (Extensible Stylesheet Language Transformations), a second of the plurality of namespaces that contains an XPath parser and evaluation engine, and a third of the plurality of namespaces that contains classes used to serialize objects into XML format documents or streams as recited in amended claim 16. Absent any such discussion or mention, Applicant respectfully submits that Vermeire cannot disclose or suggest the application programming interface of amended claim 16.

As neither Sarkar nor Vermeire discloses or suggests the application programming interface of amended claim 16, Applicant respectfully submits that



the combination of Sarkar and Vermeire does not disclose or suggest the application programming interface of amended claim 16.

For at least these reasons, Applicant respectfully submits that amended claim 16 is allowable over Sarkar in view of Vermeire.

With respect to amended claim 19, amended claim 19 recites:

A computer system including one or more microprocessors and one or more software programs, the one or more software programs utilizing an application program interface to request services from an operating system, the application program interface including separate commands to request services that make available support for processing XML documents, the separate commands being grouped into different namespaces including a first namespace to support XSLT (Extensible Stylesheet Language Transformations) and a second namespace to serialize objects into XML format documents or streams

Applicant respectfully submits that no such one or more software programs utilizing such an application program interface is disclosed or suggested in Sarkar in view of Vermeire.

With respect to Sarkar, Sarkar is not cited as disclosing or suggesting, and does not disclose or suggest, an application program interface including separate commands to request services that make available support for processing XML documents, much less the separate commands being grouped into different namespaces as recited in amended claim 19.

With respect to Vermeire, Applicant notes that Vermeire discusses an operator interface for the MPADS (Machine and Programming Architecture and Host Data Structure) component that invokes a parser to convert source code into a tree form, provide editing for the tree and generating the metadata XML using the XML Writer class (see, col. 20, lines 8-10, and col. 5, lines 55-57). However,

nowhere in Vermeire is there any discussion or mention of grouping commands included in an application program interface into different namespaces, much less of the namespaces including a first namespace to support XSLT (Extensible Stylesheet Language Transformations) and a second namespace to serialize objects into XML format documents or streams as recited in amended claim 19. Absent any such discussion or mention, Applicant respectfully submits that Vermeire cannot disclose or suggest the grouping commands included in an application program interface into different namespaces as recited in amended claim 19.

As neither Sarkar nor Vermeire discloses or suggests the grouping commands included in an application program interface as recited in amended claim 19, Applicant respectfully submits that the combination of Sarkar and Vermeire does not disclose or suggest the grouping commands included in an application program interface as recited in amended claim 19.

For at least these reasons, Applicant respectfully submits that amended claim 19 is allowable over Sarkar in view of Vermeire.

With respect to amended claim 22, amended claim 22 recites in part:

receiving one or more calls from one or more remote devices over a network, wherein the one or more calls are to one or more functions that make available support for processing XML documents, the one or more functions being grouped into a plurality of namespaces with a first namespace containing an XPath parser and evaluation engine and a second namespace containing classes used to serialize objects into XML format documents or streams; and

Applicant respectfully submits that no such one or more functions is disclosed or suggested in Sarkar in view of Vermeire.

With respect to Sarkar, Sarkar is not cited as disclosing or suggesting, and does not disclose or suggest, receiving one or more calls from one or more remote devices over a network, wherein the one or more calls are to one or more functions that make available support for processing XML documents, much less the functions being grouped into a plurality of namespaces as recited in amended claim 22.

With respect to Vermeire, Applicant notes that Vermeire discusses an operator interface for the MPADS (Machine and Programming Architecture and Host Data Structure) component that invokes a parser to convert source code into a tree form, provide editing for the tree and generating the metadata XML using the XML Writer class (see, col. 20, lines 8-10, and col. 5, lines 55-57). However, nowhere in Vermeire is there any discussion or mention of grouping one or more functions into a plurality of namespaces, much less of the plurality of namespaces including a first namespace containing an XPath parser and evaluation engine and a second namespace containing classes used to serialize objects into XML format documents or streams as recited in amended claim 22. Absent any such discussion or mention, Applicant respectfully submits that Vermeire cannot disclose or suggest the receiving of amended claim 22.

As neither Sarkar nor Vermeire discloses or suggests the receiving of amended claim 22, Applicant respectfully submits that the combination of Sarkar and Vermeire does not disclose or suggest the receiving of amended claim 22.

For at least these reasons, Applicant respectfully submits that amended claim 22 is allowable over Sarkar in view of Vermeire.

With respect to amended claim 25, amended claim 25 recites in part:

calling, to one or more remote devices over a network, one or more functions that make available support for processing XML documents, the one or more functions being grouped into a plurality of namespaces with a first namespace containing classes and enumerations to support XSLT (Extensible Stylesheet Language Transformations) and a second namespace containing classes used to serialize objects into XML format documents or streams;

Applicant respectfully submits that no such calling of one or more functions is disclosed or suggested in Sarkar in view of Vermeire.

With respect to Sarkar, Sarkar is not cited as disclosing or suggesting, and does not disclose or suggest, calling one or more functions, the one or more functions being grouped into a plurality of namespaces as recited in amended claim 25.

With respect to Vermeire, Applicant notes that Vermeire discusses an operator interface for the MPADS (Machine and Programming Architecture and Host Data Structure) component that invokes a parser to convert source code into a tree form, provide editing for the tree and generating the metadata XML using the XML Writer class (see, col. 20, lines 8-10, and col. 5, lines 55-57). However, nowhere in Vermeire is there any discussion or mention of grouping functions into a plurality of namespaces, much less of the namespaces including a first namespace containing classes and enumerations to support XSLT (Extensible Stylesheet Language Transformations) and a second namespace containing classes used to serialize objects into XML format documents or streams as recited in amended claim 25. Absent any such discussion or mention, Applicant respectfully submits that Vermeire cannot disclose or suggest calling one or more functions, the one or more functions being grouped into a plurality of namespaces as recited in amended claim 25.

As neither Sarkar nor Vermeire discloses or suggests calling one or more functions, the one or more functions being grouped into a plurality of namespaces as recited in amended claim 25, Applicant respectfully submits that the combination of Sarkar and Vermeire does not disclose or suggest the calling one or more functions, the one or more functions being grouped into a plurality of namespaces as recited in amended claim 25.

For at least these reasons, Applicant respectfully submits that amended claim 25 is allowable over Sarkar in view of Vermeire.

Claims 2, 17, 20, 23, and 26 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sarkar in view of Lam. Applicant respectfully submits that claims 2, 17, 20, 23, and 26 are not obvious over Sarkar in view of Lam.

In view of the discussion above regarding Lam, Lam is removed as prior art. Given that claims 2, 17, 20, 23, and 26 are rejected under §103 based in part on Lam, and no art rejection is made of any of the claims using any reference or combination of references that does not include Lam, Applicant respectfully submits that the cited references, without Lam, do not disclose or suggest claims 2, 17, 20, 23, and 26.

Claims 3, 13-15, 18, 21, 24, and 27 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Sarkar in view of Lam and Neumayer. Applicant respectfully submits that claims 3, 13-15, 18, 21, 24, and 27 are not obvious over Sarkar in view of Lam and Neumayer.

In view of the discussion above regarding Lam, Lam is removed as prior art. Given that claims 3, 13-15, 18, 21, 24, and 27 are rejected under §103 based in part on Lam, and no art rejection is made of any of the claims using any

reference or combination of references that does not include Lam, Applicant respectfully submits that the cited references, without Lam, do not disclose or suggest claims 3, 13-15, 18, 21, 24, and 27.

Applicant respectfully requests that the §103 rejections be withdrawn.

## Conclusion

Claims 1-27 are in condition for allowance. Applicant respectfully requests reconsideration and issuance of the subject application. Should any matter in this case remain unresolved, the undersigned attorney respectfully requests a telephone conference with the Examiner to resolve any such outstanding matter.

Respectfully Submitted,

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